

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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LENOVO HOLDING COMPANY, INC., LENOVO (UNITED STATES)  
INC., and MOTOROLA MOBILITY LLC,  
Petitioner,

v.

DODOTS LICENSING SOLUTIONS LLC,  
Patent Owner.

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Case IPR2019-01279  
Patent No. 8,510,407

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**PETITIONERS' MOTION FOR WITHDRAWAL AND SUBSTITUTION  
OF COUNSEL**

Mail Stop Patent Board  
Patent Trial and Appeal Board  
P.O. Box 1450  
Alexandria, VA 22313-1450

**I. RELIEF REQUESTED**

Pursuant to 37 C.F.R. § 42.10, Petitioners Lenovo Holding Company, Inc., Lenovo (United States) Inc., and Motorola Mobility LLC (“Petitioners”) respectfully request that the Patent Trial and Appeal Board authorize withdrawal of Charanjit Brahma and Dustin Weeks as its counsel and appoint John Alemanni as lead counsel and Mathew Meyer as back-up counsel.

**II. STATEMENT SHOWING GOOD CAUSE FOR THE BOARD TO AUTHORIZE WITHDRAWAL AND SUBSTITUTION OF COUNSEL**

For good cause, Petitioners request that the current designated counsel be deemed withdrawn from the present proceeding, and new counsel, John Alemanni and Mathew Meyer, be designated lead and back-up counsel, respectively, to represent Petitioners in this proceeding.

Petitioners’ new counsel meet the requirements of 37 C.F.R. § 42.10(c) as lead counsel and registered practitioners.

In identifying and designating new counsel who are ready and able to take over the representation, reasonable steps have been taken to “avoid foreseeable prejudice to the rights of the client, including giving due notice to his or her client [and] allowing time for employment of another practitioner.” See 37 C.F.R. § 42.40(a). Further, Petitioners believe that granting this motion will not hinder the economy, the integrity of the patent system, the efficient administration of the

Office, or the ability of the Office to timely complete this proceeding. See 37 U.S.C. § 316(b).

Petitioner verifies that no further extensions of time will be sought by Substitute Counsel.

### **III. PATENT OWNER DOES NOT OBJECT TO THE SUBSTITUION**

Patent Owner has indicated it does not oppose the requested withdrawal and substitution of counsel for Petitioners.

### **IV. CONCLUSION**

For the foregoing reasons, Petitioners respectfully requests that the Board authorize the withdrawal of current counsel and substitution of new counsel.

Dated: March 17, 2020

Respectfully submitted,

/Dustin Weeks/

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**CERTIFICATE OF SERVICE (37.C.F.R. § 42.6(e))**

The undersigned hereby certifies that a true and correct copy of the forgoing **PETITIONERS' MOTION FOR WITHDRAWAL AND SUBSTITUTION OF COUNSEL** was served electronically via e-mail on March 17, 2020 in its entirety on the following counsel of record for Patent Owner:

Lewis Hudnell  
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*Attorneys for Patent Owner*

Dated: March 17, 2020

/Dustin B. Weeks/  
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